

# STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.  
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<b>Operator: AMEREN ILLINOIS COMPANY</b>	Operator ID#: 32513
<b>Inspection Date(s): 12/10/2015, 12/8/2015, 12/9/2015</b>	Man Days: 3
<b>Inspection Unit: Alton</b>	
<b>Location of Audit:</b>	
<b>Exit Meeting Contact: Ron Kelly</b>	
<b>Inspection Type: Standard Inspection - Record Audit</b>	
<b>Pipeline Safety Representative(s): Jim Watts</b>	
<b>Company Representative to Receive Report: Michael Fuller</b>	
<b>Company Representative's Email Address: mfuller2@ameren.com</b>	

<b>Headquarters Address Information:</b>	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
<b>Official or Mayor's Name:</b>	Ron Pate Phone#: (217) 424-6518 Email:	
<b>Inspection Contact(s)</b>	<b>Title</b>	<b>Phone No.</b>
Bob Roth	Superintendent Quality Assurance	
Chuck Tebbe	Quality Assurance Consultant	
Ron Kelly	Superintendent Gas Operations Division 5	

Gas System Operations	Status
Gas Transporter	Enable/Mississippi River Transmission
Annual Report (Form 7100.1-1) reviewed for the year:	Not Checked
<b><u>General Comment:</u></b> <i>The annual report information is reviewed during the Ameren Audit performed at Pawnee.</i>	
Unaccounted for Gas	Not Checked
<b><u>General Comment:</u></b> <i>The annual report information is reviewed during the Ameren Audit performed at the Ameren Training Center in Pawnee, Illinois.</i>	

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Number of Services	Not Checked
<b><u>General Comment:</u></b> <i>The annual report information is reviewed during the Ameren Training Center audit performed at Pawnee, Illinois.</i>	
Miles of Main	Not Checked
<b><u>General Comment:</u></b> <i>The annual report information is reviewed during the Ameren Training Center audit performed at Pawnee, Illinois.</i>	
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory
<b><u>General Comment:</u></b> <i>Documentation of MAOP's is retained by the Design Center in Belleville, Illinois and is also recorded on the regulator station inspection documentation.</i>	
Operating Pressure (Feeder)	365
Operating Pressure (Town)	.3, 20, 25, 40, 55, 58
Operating Pressure (Other)	Not Applicable
<b><u>General Comment:</u></b> <i>There are no other pressure systems in the Alton Service Area.</i>	
MAOP (Feeder)	400
<b><u>General Comment:</u></b> <i>Alton now has approximately 90 feet of piping that operates above 100 psig. This is an inlet to a reg station on Straube Lane in Alton that is supplied by piping operated by the Maryville Service Area.</i>	
MAOP (Town)	.6, 25, 60
MAOP (Other)	Not Applicable
<b><u>General Comment:</u></b> <i>There are no other MAOP's in the Alton Service Area.</i>	
Does the operator have any transmission pipelines?	No
<b><u>General Comment:</u></b> <i>There is no transmission piping in the Alton system.</i>	
<b>Regulatory Reporting Records</b>	<b>Status</b>
[191.5]	Not Applicable
<b><u>General Comment:</u></b> <i>No reportable incidents occurred in the Alton system in 2013-2014.</i>	
[191.9(a)]	Not Applicable

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	within 30 days after detection of an incident?	
<b>General Comment:</b> <i>No written reports were required to be submitted due to no reportable incidents occurring in the Alton system in 2013-2014.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	<b>Not Applicable</b>
<b>General Comment:</b> <i>No supplemental reports were required to be submitted due to no reportable incidents occurring in the Alton system in 2013-2014.</i>		
Did the operator have any plastic pipe failures in the past calendar year?		<b>No</b>
<b>General Comment:</b> <i>There were no plastic pipe failures to report in 2013-2014 in the Alton service area.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		<b>Yes</b>
<b>General Comment:</b> <i>There were no plastic pipe or fitting failures to report in 2013-2014 with the exception of Aldyl A tee caps of which the cause has been identified as being from overtightening during installation. The caps are being replaced with a different style when excavated or during leak repairs.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	<b>Not Applicable</b>
<b>General Comment:</b> <i>There were no Safety Related Conditions to report in 2013-2014 for the Alton service area.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	<b>Not Applicable</b>
<b>General Comment:</b> <i>There were no Safety Related Conditions to report in 2013-2014 for the Alton service area.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	<b>Satisfactory</b>
<b>General Comment:</b> <i>This requirement is met by a customer packet that is sent to a new customer within 90 days of signing up for gas service. The packet includes information regarding customer's responsibility for piping downstream of the meter set.</i>		
<b>TEST REQUIREMENTS</b>		<b>Status</b>
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	<b>Not Applicable</b>
<b>General Comment:</b> <i>No work was performed that required a pressure test on piping operating at or above 100 psig in 2013-2014.</i>		

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[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	<b>Satisfactory</b>
<b>General Comment:</b> Pressure testing documentation is retained for the life of the system. Review of documentation of new services installed in 2013-2014 indicate they were tested as required.		
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	<b>Satisfactory</b>
<b>General Comment:</b> Review of documentation for temporarily disconnected services indicate they were tested as required in 2013-2014.		
<b>UPRATING</b>		<b>Status</b>
<b>Category Comment:</b> No uprating was performed in the Alton Service Area 2013-2014.		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	<b>Not Applicable</b>
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	<b>Not Applicable</b>
<b>OPERATIONS</b>		<b>Status</b>
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	<b>Not Checked</b>
<b>General Comment:</b> This was not reviewed during the Alton inspection. This information is reviewed during the Ameren Pawnee audit.		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		<b>Not Checked</b>
<b>General Comment:</b> This was not reviewed during the Alton inspection. This information is reviewed during the Ameren Pawnee audit.		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	<b>Satisfactory</b>
<b>General Comment:</b> Construction records, maps and operating history is available to field personnel using their onboard computers. Historical operating information is available through their supervisor or office personnel.		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	<b>Satisfactory</b>
<b>General Comment:</b> Ameren utilizes Field Supervisors and Quality Assurance personnel to conduct field evaluations of their personnel to ensure they are following established procedures. No deficiencies were identified by the Alton field supervisors that required modifications to current procedures in 2013-2014. The Quality Assurance personnel findings is reviewed during the Ameren Training Center audit.		

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CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of patrols performed in 2013-2014 indicate corrective actions were taken when facilities were observed needing corrective actions. No issues were identified during patrols and inspections in 2013-2014 that required revisions to current class locations. Review of leak repair documentation for 2013-2014 indicate leaks were repaired as required and rechecks were performed as required on outstanding leaks. Review of cathodic protection inspections indicate actions were taken to correct deficiencies identified during the 2013-2014 monitoring and testing.</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no known cast iron piping located in the Alton Service Area.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no known cast iron piping located in the Alton Service Area.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no known cast iron piping located in the Alton Service Area.</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no known cast iron piping located in the Alton Service Area.</i>		
DAMAGE PREVENTION RECORDS		Status
<b><u>Category Comment:</u></b> <i>Damage prevention is not reviewed during the local operations audits. This was reviewed during the damage prevention audit performed at the Ameren Training Center in Pawnee, Illinois in 2014.</i>		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	<b>Not Checked</b>

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Has the number of damages increased or decreased from prior year?		<b>Not Checked</b>
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	<b>Not Checked</b>
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	<b>Not Checked</b>
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		<b>Not Checked</b>
Do pipeline operators include performance measures in facility locating contracts?		<b>Not Checked</b>
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? <a href="http://www.icc.illinois.gov/julie/">http://www.icc.illinois.gov/julie/</a>	<b>Not Checked</b>
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		<b>Not Checked</b>
Were Common Ground Alliance Best Practices discussed with the Operator?		<b>Not Checked</b>
<b>EMERGENCY PLANS</b>		<b>Status</b>
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> Supervisors are provided current editions of the Emergency Plan. The emergency plan is also available electronically online.		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> Staff reviewed the rosters for the emergency plan reviews and determined they were conducted in the Alton service area in January of 2013 and February of 2014.		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> No emergencies occurred in the Alton service area in 2013-2014 that required a review to be completed.		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		

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*This documentation is reviewed during the Public Awareness review conducted at the Ameren Training Center in Pawnee, Illinois which was last conducted in February of 2014. Ameren's Public Awareness personnel conduct the liaison with appropriate fire, police and public officials.*

[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	<b>Satisfactory</b>
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**General Comment:**

*There was one leak call out received on the 19th of October, 2013 that exceeded 60 minutes. Ameren received 2 calls on a Saturday within 20 minutes of each other. The initial responder was not able to respond to the second call in sufficient time because he was not completed with the first leak call. The second call out was conducted by Duty Supervisor who contacted a qualified service man to take the leak call. Excess response time was due to drive time to Grafton and the time it took the Duty Supervisor to dispatch a second service man.*

ODORIZATION OF GAS		Status
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	<b>Satisfactory</b>

**General Comment:**

*Review of the monthly inspections maintained in GCS for the injection odorizer for the Alton area determined, the odorizer located at Federal Tower Station which is the primary supply point for Alton from Enable/MRT. The second odorizer located at Chesson Lane which is a second feed to the Alton system located in the northern section were both inspected monthly in 2013-2014 for proper operation and measurement of odorant usage.*

[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	<b>Satisfactory</b>
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**General Comment:**

*Review of odorometer tests performed in the Alton service area in 2013 -2014, were completed monthly and indicate the level of odorant in the natural gas was detectable below 1/5 the lower explosive limit.*

[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	<b>Not Applicable</b>
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**General Comment:**

*Ameren Illinois is not a Master Meter operator.*

[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	<b>Not Applicable</b>
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**General Comment:**

*Ameren Illinois is not a Master Meter operator.*

PATROLLING & LEAKAGE SURVEY		Status
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	<b>Not Applicable</b>

**General Comment:**

*There is no above ground main located in the Business Districts in the Alton service areas that required quarterly inspections.*

[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	<b>Satisfactory</b>
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<b><u>General Comment:</u></b>		
Alton service area has 11 overhead crossings that were patrolled / inspected twice annually in 2013-2014. There is also a pipeline marker survey that was conducted annually in 2013-2014.		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Review of Business District Leak Surveys documentation for the Alton service area for 2013-2014, indicate they were completed within the calendar year/15 month limitation. These surveys also included inspection of inside meter installations. Ameren also conducted a school service line survey annually in the Alton service area in 2013-2014. Staff reviewed corrective actions of issues identified during these surveys in 2013-2014 to determine what actions were taken to correct findings noted during the above inspections.		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Review of the residential leak survey documentation for the Alton service area indicate the Yard Line Survey was performed in July of 2013. Residential leak surveys performed in 2013-2014 indicate they were completed within the required intervals. Staff selected random leaks to review repair information and corrective actions on atmospheric corrosion detected or identified during the above surveys.		
<b>YARD LINES - RESIDENTIAL</b>		<b>Status</b>
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Review of the Residential leak survey documentation for the Alton service area indicate the Yard Line Survey was performed in July of 2013.		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	<b>Not Applicable</b>
<b><u>General Comment:</u></b>		
All yard lines are designated as unprotected piping and are surveyed on a three year interval.		
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Review of the yard line leak survey documentation for the Alton service area indicate the survey was performed in July of 2013 and is conducted once every three years not to exceed 39 months.		
<b>ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES</b>		<b>Status</b>



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[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of replaced mains and services indicated that lines reviewed were abandoned as required and the open ends were sealed.</i>		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of replaced mains and services indicated that lines reviewed were abandoned as required and the open ends were sealed.</i>		
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed random completed orders in OAS for 2013 - 2014 and determined that the riser valve was locked in the closed position when service to a customer was terminated.</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of main replacements indicates purging was performed as required to ensure air is removed and 100 percent gas is present.</i>		
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Alton has no piping within their service area that crosses a navigable waterway.</i>		
<b>PRESSURE LIMITING AND REGULATION</b>		<b>Status</b>
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of pressure regulating station and overpressure protection inspections recorded in GCS being performed in 2013-2014 for the Alton service area indicate, the stations were inspected as required and were set within the allowed pressure limitations.</i>		
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	<b>Satisfactory</b>

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<b><u>General Comment:</u></b>		
Review of relief capacity calculations maintained in GCS indicate the station engineering reviews were completed as required in 2013-2014.		
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Review of relief capacity calculations maintained in GCS indicate the station engineering reviews were completed as required in 2013-2014.		
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
The Alton pressure system has two points of supply and is monitored by an electronic pressure recording chart. The remaining systems are single feeds and also have electronic pressure recording devices installed. Ameren Illinois Gas Control monitors the ERX (Electronic Pressure) recording devices. The alarms and corrective actions taken are reviewed during the Gas Control Audit performed in Springfield, Illinois. The last audit was conducted in November of 2014.		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
Ameren reported there were no callouts in 2013-2014 due to abnormally high or low pressures in the Alton systems. The ERX pressure recorder alarms are reviewed during the Gas Control audit performed in Springfield, Illinois. Gas Control monitors the electronic pressure recorders and dispatches personnel when high or low pressure alarms are received.		
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	<b>No</b>
<b><u>General Comment:</u></b>		
At their Federal Station, Ameren has a monitor controller on a ball valve located downstream of their take point with Enable/MRT. This protects the distribution system against overpressure and was inspected as required.		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	<b>Not Applicable</b>
<b><u>General Comment:</u></b>		
Ameren has a monitor controller on a ball valve downstream of the take point with Enable/MRT at Federal Station.		
<b>VALVE MAINTENANCE</b>		<b>Status</b>
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
Review of distribution valve inspections performed in the Alton service area determined they were completed as required in 2013-2014.		

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[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no vaults in the Alton system that meet the 200 cubic feet requirement in 2013-2014.</i>		
<b>Investigation Of Failures</b>		<b>Status</b>
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>There were no accidents or failures in the Alton service area that required analysis in 2013-2014.</i>		
<b>WELDING OF STEEL PIPE</b>		<b>Status</b>
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>Ameren has qualified welding procedures that are maintained in the O&amp;M. These were not reviewed during this audit and are reviewed during O&amp;M review conducted at the Ameren Training Center.</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification as required?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>There were two qualified welders working out of the Alton Service Center in 2013-2014. Review of welder qualification documentation indicate they were both qualified for welding as required in 2013-2014.</i>		
[192.807]	Does the operator have documentation of welder OQ records?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>The Operator Qualification records are retained and reviewed during the Ameren Training Center audit. This was last reviewed in February of 2014 at the Training Center.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There was no NDT testing performed in the Alton Service Area in 2013-2014.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There was no NDT testing performed in the Alton Service Area in 2013-2014.</i>		
<b>JOINING OF MATERIAL OTHER THAN WELDING</b>		<b>Status</b>
<b><u>Category Comment:</u></b>		

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<i>This documentation was not reviewed during this audit and maintained and is reviewed during the Operator Qualification audit performed in February of 2014 at the Ameren Training Center.</i>		
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	<b>Not Checked</b>
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	<b>Not Checked</b>
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	<b>Not Checked</b>
<b>CORROSION CONTROL RECORDS</b>		<b>Status</b>
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Cathodically protected piping located in the Alton service area is mapped using GTECH (Computer Mapping System). This includes the location of insulators and test points. The corrosion technician for the Alton service area has and is still maintaining paper maps as work is completed. Documentation of completed work is now maintained in Maximo. Past work was recorded in GCS.</i>		
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of pipe examination forms for 2013-2014 indicate the evaluations were completed as required and included pipe to soils when steel piping was exposed and coating was removed to allow for the test to be completed.</i>		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of pipe to soil monitoring performed in 2013-2014 indicate the testing was performed within the required intervals for annual and 10 year inspections. Review of corrective action documentation indicates proper actions were taken where potentials were observed near or below -.850v to achieve an adequate level of protection.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no rectifiers in the Alton system. The inlet piping to the Straube Lane ALR-556 station is protected by a rectifier that is maintained by the Maryville service area.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no critical or non-critical bonds in the Alton system.</i>		

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[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of corrective action documentation indicates proper actions were taken where potentials were observed near or below -.850v to achieve an adequate level of protection.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no unprotected Ameren piping in the Alton system. Customer yard lines are surveyed as unprotected piping and were completed on a three year interval last being surveyed in 2013.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Casing inspections in the Alton service area were conducted as required in 2013-2014 and indicate isolation is being achieved.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of the number of test points located in the Alton system indicates, Alton had a sufficient number of test stations in 2013-2014 to determine adequate levels of protection.</i>		
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of test stations in 2013-2014 that had issues with continuity were corrected as required or were abandoned and another point was selected to monitor that given control.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There are no rectifiers in the Alton system so no testing was required to determine if they are affecting neighboring facilities or utilities.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren does not transport corrosive gas in the Alton system. They receive pipeline quality gas under contract from their supplier Enable/MRT.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal	<b>Satisfactory</b>

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	surface inspections performed when pipe is removed for any reason?	
<b>General Comment:</b> <i>Review of piping inspections performed in 2013-2014 indicate internal inspections were conducted and documented as required when piping was separated or removed or taps coupons were retrieved.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	<b>Not Applicable</b>
<b>General Comment:</b> <i>Corrosion coupon testing is not required due to no corrosive gas being transported in the Alton system or indications of internal corrosion having been previously identified.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	<b>Satisfactory</b>
<b>General Comment:</b> <i>The atmospheric corrosion survey is conducted by Ameren during the leak survey conducted once every four years. This was allowed by a waiver approved by the ICC and PHMSA.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Review of issues identified during the leak surveys performed in 2013-2104 indicate corrective actions were taken to correct coating and corrosion issues identified.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	<b>Not Applicable</b>
<b>General Comment:</b> <i>No piping was observed having been removed due to external corrosion. All steel piping that is replaced is coated cathodically protected steel piping or is replaced using plastic piping which requires no cathodic protection.</i>		
<b>TRAINING - 83 IL ADM. CODE 520</b>		<b>Status</b>
<b>Category Comment:</b> <i>Training documentation is reviewed during the Ameren Training Center audit and is completed in conjunction with the Operator Qualification audit completed in 2014. Ameren has an Apprenticeship Program for new hires which requires that they attend classroom sessions and work with qualified Journeymen to learn and perform tasks under their direction when allowed using the span of control.</i>		
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	<b>Not Checked</b>
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	<b>Not Checked</b>
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate	<b>Not Checked</b>

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	training?	
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	<b>Not Checked</b>

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